

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Jimmie Lewis

v.

CANo. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR DISCOVERY # 2(A)  
FROM AND FOR DEFENDANT  
DR. SYLVIA FOSTER PURSUANT  
TO FED R. CIV P # 34



BD Scanned

DATE : 2/28/07

Jimmie Lewis  
SBI # 506622  
DEL. CORR. CENTER  
1181 PADDOCK RD  
SMYRNA, DEL 19977

- 1.) FOR THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C.'S SECLUSION / RESTRAINT PATIENT FEEDBACK FORMS , SECLUSION AND OR RESTRAINT FORMS , NURSING ASSESSMENT FORMS , DOCTOR ORDER SHEETS DATING FROM 5/21/04 TO 6/25/04 , THE F.C.M CONSULTATION REQUEST DATED JUNE 9,04 , INCIDENT - REPORTS , 6 PAGE SOCIAL ASSESSMENT DATED 5/24/04 , CONSULTATION REQUEST DATED 6/9/04 , DEPARTMENT OF HEALTH AND SOCIAL SERVICES INSTITUTION ADMISSION RECORD DATED 5/21/04 , INTERDISCIPLINARY GROUP THERAPY / DOCUMENTATION SHEET , PROGRESS NOTES DATING FROM 5/21/04 TO 6/25/04 , TO BE TYPED BECAUSE SAID DISCOVERY INFORMATION IS NOT LEGIBLE IN USEABLE FORM .
- 2.) DR. SYLVIA FOSTER'S D.P.C WORK SCHEDULE DATING FROM 5/21/04 TO 6/25/04 , DURING THE COURSE OF THE PLAINTIFF'S STAY AT THE D.P.C

3.) THE D.P.C WORK SCHEDULE FOR  
ALL OF WITNESS DR. FOSTER  
INTENDS TO CALL AS WITNESSES,  
DATING FROM 5/21/04 TO 6/25/04  
THE COURSE OF THE PLAINTIFFS STAY  
AT THE D.P.C FOR THE PURPOSE OF CREDIBILITY.

4.) A LIST OF WITNESSES DR. SYLVIA FOSTER  
INTENDS TO CALL.

5.) A LIST PERSONS WHO ARE TO PROVIDE  
EXPERT TESTIMONY IN THIS CASE AND OR  
WHOSE DUTIES AS EMPLOYEE INVOLVES GIVING  
TESTIMONY ALONG WITH ANY WRITTEN REPORT(S)  
FOR WHICH SHALL CONTAIN SIGNATURES,  
COMPLETE STATEMENTS OF OPINIONS AND THE BASIS  
THEREOF ALONG WITH THE DATA UTILIZED IN FORMING  
OPINION, EXHIBITS USED AS SUMMARY REPORTS, THE  
QUALIFICATION OF THE WITNESS, A LIST OF ALL  
PUBLICATIONS AUTHORED BY THE WITNESS WITHIN  
THE PROCEEDING TEN YEARS, COMPENSATION PAID FOR  
THE STUDY AND TESTIMONY, AND A LIST OF ANY  
OTHER CASES THE WITNESS HAS TESTIFIED AS  
AN EXPERT WITNESS WITHIN THE PROCEEDINGS  
FOUR YEARS.

6.) PHOTO COPIES OF DR. FOSTERS  
BONDS, LEASES, BANK ACCOUNT STATEMENTS  
FOR THE PAST TWELVE MONTHS, BEQUESTS,  
DEVISES, ANNUITIES, PENSION AND RETIREMENT  
BENEFITS, NOTES, INSURANCE POLICY,  
INSURANCE BENEFITS, ALL DOCUMENTS OF TITLES -  
DEEDS - STOCKS - WAREHOUSE AND OR  
STORAGE RECEIPTS - DEBENTURES - CERTIFICATES -  
MORTGAGES - BILLS - DEPOSIT OF BANKS -  
SAVINGS AND LOAN STATEMENTS, JUDGEMENT  
OF LIENS, INDORSEMENTS, ACQUITTANCES,  
1040 OR 1040 EZ AND W2 TAX FORMS, SECURITY  
INSTRUMENTS AND OTHER DEBTS AND OBLIGATIONS  
IN WRITING OF WHATEVER KIND; DUE TO  
DR. S. FOSTER BEING A CONTRACT PSYCHIATRIST.

7.) THE NEW CASTLE COUNTY SUPERIOR COURT,  
COURT ORDER THAT GRANTED AUTHORITY  
FOR THE PLAINTIFF TO BE PSYCHIATRICALLY  
EVALUATED FOR COMPETENCY AT THE D.P.C

- 8.) THE OFFICIAL NEW CASTLE COUNTY SUPERIOR COURT ORDER THAT WAS DOCKETED WITH THE NEW CASTLE COUNTY CLERK OR THE PROTHONOTARY, GRANTING THE DEFENDANT AUTHORITY TO SEND AND OR HAVE THE PLAINTIFF TRANSFERRED BACK TO THE D.O.C BEFORE CONDUCTING HIS COMPETENCY HEARING AND BEFORE HIS GRIEVANCES WERE COMPLETELY EXHAUSTED.
- 9.) A PHOTO COPY OF DR. FOSTER'S PSYCHIATRIC LICENCE THAT GAVE HER AUTHORITY TO PRACTICE PSYCHIATRY DATING FROM 5/21/04 TO 6/25/04.
- 10.) A PHOTO COPY OF DR. FOSTER'S D. P. C JOB CONTRACT OF EMPLOYMENT.
- 11.) DR. FOSTER'S PREVIOUS CIVIL COMPLAINT ACTION NUMBERS, DATES, FINAL JUDGEMENT DECISIONS AND PHOTO COPIES OF SAID COMPLAINTS.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS  
DUE HEREBY CERTIFY ON THIS 28<sup>th</sup>, DAY OF FEB,  
2007, THAT I DID MAIL ONE TRUE AND CORRECT  
COPY OF THE MOTION FOR DISCOVERY # 2 (A)  
FROM AND FOR DEFENDANT DR. SYLVIA FOSTER  
PURSUANT TO FED R. CIV P# 34, BY U.S. POSTAL  
TO THE FOLLOWING:

CLERK OF THE COURT (GMS )  
UNITED STATES DISTRICT COURT  
844 N. KING ST., LOCK BOX 18  
WILMINGTON, DELAWARE 19801

LOUIS J. RIZZO JR  
1001 JEFFERSON PLAZA  
SUITE 202  
WILMINGTON, DELAWARE 19801

DATE: 2/28/07

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